Galvas

MAR 14 1989

Major Dw. Harris
New York National Guard
Civil Engineer
Suffolk County Air National Guard Base
Westhampton Beach, New York 11978-1294

Re: Comments on the Additional Investigation Work Plan for Phase II/IV-A Remedial Action Plan for the Fire Training Area

Dear Major Harris:

The submitted Additional Investigation Work Plan for Phase 11\1V-A Remedial Action Plan for the Fire Training Area was reviewed by EPA. A copy of our comments are attached for your information.

As you can see, the comments to this Work Plan are not extensive, but indicate some deficiencies. The ultimate goal of the additional investigation was not clear, which made it difficult to recognize the ability of the study to achieve the final objectives. Additionally, the title for this study should be changed from "Remedial Action Plan" to a work plan for site characterization study since the results will lead to a remedial investigation not a remedial action.

The plan, as it is presented, is designed to locate the source of the 2-butanone contamination. The scope of work includes the exploratory monitoring elements of hydrogeological study. However, no effort is made to further determine the full extent of existing contamination beyond that which was previously identified in the site characterization report (1987). The objectives of any new investigation to be performed at this site, must include both locations of the sources and definition of the extent of contamination. These are the criteria we used in our approach to evaluating the adequacy of the Work Plan.

In addition, three aggregated sites (Canine Landfill, Runaway Disposal Area, and Fire Training Area) of the former SCAFB are currently undergoing the HRS scoring procedure. Please bear in mind, that if these sites are included on the National Priority List (NPL), SANGB is required to follow all CERCLA/SARA regulations in order to implement the Superfund/CERCLA requirements.

One of the requirements is the definition of the extent of contamination. Developing the comprehensive monitoring program now could save time and money in the future.

If you have any questions, please contact Galina Tsoukanova of my staff at (212) 264-6665.

Sincerely yours,

Vincent Pitruzzello, Chief
Program Support Branch

Attachment

cc: R. Hargrove, EPA-EIB

bcc: LTC Washeleski, ANGSC/SGB
MAJ Esposito

General Comments

1. Page 1, 1.0.
An explanation is needed to the statement: "The focus of this additional work is to address the presence of 2-butanone (i.e., methylethyl ketone or MEK) in groundwater upgradient and downgradient of the FTA". Is it the main goal of this work or the only one of the procedures of the whole scope of work? What is the ultimate goal of this additional investigation?

2. Page 1, Task 3; Page 4, 2.3 Task 3.
The purpose of the Task 3 in this Work Plan is installation of four additional monitoring wells upgradient of FTA. The area around the FTA needs a more detailed monitoring program. Four monitoring wells, located only upgradient from FTA, cannot characterize the full extent and configuration of the plume. The existing data is inadequate to delineate the contour of 2-butanone, especially its lateral extension. So far, the only one linear direction of this contaminant migration is traced. North East and South West areas from the FTA need to be monitored also. The downgradient area, between highly contaminated MW-107 and the Meetinghouse Road water supply wells, remain unexplored. The potential risk for these water supply wells still exists. But the fate of the 2-butanone during its migration towards these potable wells, located about 3000 feet downgradient from MW-107, is unknown. The possible migration of 2-butanone must be traced downgradient and explored laterally by installation of an adequate amount of monitoring wells.

3. Page 2; Task 1.
It is unacceptable not to extend the record search beyond five years. The reason for choosing the five years period is based on calculation of contaminant migration which assumed that FTA was the source of contamination. However, it is known that the FTA is not the corroborated source of contamination. The high 2-butanone concentrations were found also in the wells upgradient from the the FTA, and presumably could be found further upgradient from the MW-101-A and MW-101-B. The limitation of time for the record search will decrease the full value of needed information. We do not recommend this restriction.

4. Page 2, Task 2.
The purging procedure should be modified for the unsecured existing wells, which are expected to be possible sources of contaminant disposal. It is advisable to make initial sampling of the stagnant water before purging in order to avoid unrepresentative analytical data. The comparison of the analytical results of the stagnant water before and ground water after the purging could help in validating these wells as the sources of contamination. Further, it is advisable to include in the Work Plan the precautions for purge water disposal. If the wells are believed to be the sources of contaminants, the best way to prevent future soil contamination is to contain the purge water and store it untill the water samples have been analyzed. Once the contaminants are identified, appropriate treatment requirements can be determined.

5. Page 4, 2.3 Task 3.
Considering the future usefulness of the new monitoring wells and their lifetime expectancy (in the case of including the sites on NPL). EPA doesn't recommend the installation of PVC casing with the presence of 2-butanone in the ground water. Exposure to ketones may cause PVC degradation and/or release of pipe ingradients ("Standard Operating Procedure for Selecting Ground Water Well Construction Material"). On NPL sites with similar contaminants EPA Region II requires the use of stainless steel for monitoring wells.

6. It appears that the absence of a soil sampling program in this additional Work Plan could create an essential gap in the soil characterization of the area of concern. The possibility of finding the locations of the potential solvents/MEK disposal on the surface was stipulated by this work plan (pages 1 and 2, Task1), and definition of contaminant distribution in the soil was also one of the main tasks of the initial work plan (Draft Work Plan, October 1986; Subtask 2A.3, page 12). There is no reason to cut off this part of the program. All the media should be explored adequately.